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June 27, 2025

By ECF Filing

Honorable Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Ho Wan Kwok, et al.
23-CR-118 (AT)

Dear Judge Torres:

Together with John Kaley and Joshua Dratel, I submit this letter on behalf of Miles Guo (a/k/a “Ho Wan Kwok”) to set forth Mr. Guo's position regarding the issue of forfeiture in the above-referenced case.

On behalf of Mr. Guo:

- We recognize that the jury’s mixed verdict in this case, in which the jury found Mr. Guo not guilty of certain counts, the simultaneous proceedings concerning Mr. Guo pending in this Court, in the U.S. Bankruptcy Court, in matters initiated by the Securities and Exchange Commission, and in other matters initiated against Mr. Guo, all create numerous unprecedented legal and factual conflicts and complications with respect to the issue of forfeiture;
- We firmly maintain Mr. Guo’s not guilty plea in this criminal case and do not concede the validity of any of the arguments or evidence presented by the Government at the trial in this case;
- In order to preserve all of Mr. Guo’s legal rights, we do not waive any of Mr. Guo’s rights, including his appellate rights, in this case or in any other pending or prospective legal matters; and
- In order to protect the interests of Mr. Guo’s supporters, investors, and other innocent third parties, we aim to facilitate the return of seized assets to Mr. Guo’s supporters, investors, and other innocent third parties in the most efficient, expeditious, and legal manner.

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In light of the unique circumstances set forth above, Mr. Guo is unable to take a position with respect to issues regarding potential forfeiture and remission of money and property seized by the Government in connection with this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Melinda Sarafa", with a long, sweeping horizontal flourish extending to the right.

Melinda Sarafa

cc: All counsel via ECF